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“Working for a Safer World”

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Andrew Fanara  
EPA Program Manager  
ENERGY STAR for Exit Signs

Mr. Fanara,

Thank you for providing an invitation and opportunity to comment on the proposed ENERGY STAR Exit Sign specifications for 2003 (Draft 1, Version 3.0). UL supports the Energy Star program and applauds its success in providing a market-based incentive for product manufacturers to develop more energy-efficient product designs.

Please accept our comments as follows, which we authorize you to post on your web site.

1. The proposed specification (under Qualifying Products) states “ENERGY STAR requires each model to be tested to and meet the UL 924 Standard for Emergency Lighting and Power Equipment.” We recommend that the phrasing (here and elsewhere) be revised to simply require qualifying signs to be “Listed in accordance with UL 924”. The term “Listed”<sup>1</sup> is well established and covers not only product construction and performance but also manufacturing control and independent auditing of production. These features of a Listing program are essential to providing confidence that the product ultimately purchased and installed actually meets the same construction and performance criteria as that originally tested.
2. The “Note” following Section 4A (“..UL tests emergency lighting and power equipment to assess a variety of safety and performance characteristics...””) should be reworded so as to refer to the UL 924 Standard rather than to UL in particular. The testing, or more significantly, “Listing”, of products in accordance with UL 924 may be provided by any appropriately accredited independent, third-party product certification organization, as noted elsewhere in the specification.
3. UL 924 is the nationally recognized Standard for determining that an exit sign provides not only adequate protection from fire and electric shock, but also adequate visibility performance to meet the needs of the model building codes

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<sup>1</sup> From Article 100 of the National Electric Code®, published by the National Fire Protection Association (NFPA): “**Listed.** Equipment, materials, or services included in a list published by an organization that is acceptable to the authority having jurisdiction and concerned with evaluation of products or services, that maintains periodic inspection of production of listed equipment or materials or periodic evaluation of services, and whose listing states that the equipment, material, or services either meets appropriate designated standards or has been tested and found suitable for a specified purpose.”

issued by NFPA and the International Code Council (ICC). Information contained throughout the ENERGY STAR web site clearly states the primary purpose of the program as promoting energy efficiency and assisting consumers in purchasing products that fulfill this objective. We commend that ENERGY STAR has recognized that energy efficiency should not be promoted in a manner that could be detrimental to other critical product performance features, such as visibility in the case of exit signs. However, including the requirement that qualifying exit signs be Listed per UL 924 fully resolves this potential conflict. We recommend that all of the additional exit sign visibility requirements within this proposal should be deleted. They deviate from the stated purpose of the ENERGY STAR program and cause the specification to be significantly more complicated to understand and implement. Equally as important, they create additional layers of unnecessary performance criteria that go beyond those established through a public consensus process.

The proposed specifications for visibility in the ENERGY STAR proposal appear to replicate those of CSA C860, a Canadian guideline for energy efficiency of electrical exit signs (non-electrical exit signs are excluded from its scope). We would like EPA to understand that the Canadian document is limited in scope and has non-mandatory status in Canada. UL 924 is more comprehensive and compliance of exit signs with this document is typically mandatory in the U.S.

The ENERGY STAR program and the related U.S. voluntary standards system can each achieve their greatest success when their respective requirements complement and support one another in a manner that provides clarity and consistency to product manufacturers and purchasers. On the presumption that EPA shares this vision, UL is fully prepared to work with EPA staff as needed to resolve the matter of conflicting exit sign requirements between UL 924 and the final Version 3.0 specifications.

Respectfully submitted,

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